

PHILLIP A. TALBERT
United States Attorney
KAREN A. ESCOBAR
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON MALDONADO, JR., AND
JESUS ANTONIO MUNOZ,

Defendants.

CASE NO. 1:23-CR-169 JLT-SKO

STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT;

DATE: December 6, 2023
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

STIPULATION

1. By previous order, this matter was set for status on December 6, 2023.
2. By this stipulation, defendants now move to continue the status conference until April 17, 2024, and to exclude time between December 6, 2023, and April 17, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes 275 Bates Stamped pages of material, including recordings and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendants desire additional time to consider the government's plea offers dated September 6, 2023.
 - c) Counsel for defendants believe that failure to grant the above-requested

1 continuance would deny them the reasonable time necessary for effective preparation, taking into
2 account the exercise of due diligence.

3 d) The government does not object to the continuance.

4 e) Based on the above-stated findings, the ends of justice served by continuing the
5 case as requested outweigh the interest of the public and the defendant in a trial within the
6 original date prescribed by the Speedy Trial Act.

7 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
8 et seq., within which trial must commence, the time period of December 6, 2023 to April 17,
9 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
10 T4] because it results from a continuance granted by the Court at defendant's request on the basis
11 of the Court's finding that the ends of justice served by taking such action outweigh the best
12 interest of the public and the defendant in a speedy trial.

13 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
14 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
15 must commence.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 IT IS SO STIPULATED.

2
3 Dated: November 22, 2023

PHILLIP A. TALBERT
United States Attorney

4
5 /s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
6 Assistant United States Attorney

7
8 Dated: November 22, 2023

/s/ Alekxia L. Torres Stalling
Alekxia L. Torres Stalling
9 Counsel for Defendant
Ramon Maldonado, Jr.

10 Dated: November 22, 2023

/s/ Roger Shahriar Bonakdar
Roger Shahriar Bonakdar
11 Counsel for Defendant
Jesus Antonio Munoz
12

13
14
15 **ORDER**

16 IT IS SO ORDERED.

17
18
19 DATED: 11/27/2023

Sheila K. Oberto
The Honorable Sheila K. Oberto
20 UNITED STATES MAGISTRATE JUDGE
21
22
23
24
25
26
27
28